

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. Nos. 20030, 20034, 23341

**CERTIFICATION OF COUNSEL**

I, Matthew B. McGuire, counsel to the above-captioned debtors and debtors-in-possession (the “Debtors”), hereby certify as follows to the best of my knowledge, information and belief:

1. On June 28, 2023, Tai Mo Shan Limited (“TMS”) filed proof of claim number 5475 against Alameda Research Ltd. (“Alameda”).

2. On May 15, 2024, TMS filed proof of claim number 94967 against Alameda, amending proof of claim number 5475.

3. On July 5, 2024, TMS filed proof of claim number 95768 against Alameda, amending proofs of claim numbers 5475 and 94967.

4. On July 10, 2024, the Debtors filed the *Debtors’ Objection to Proofs of Claim Filed By Tai Mo Shan Limited* [D.I. 20030] (the “Objection”) and the *Declaration of Steven*

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<sup>1</sup> The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

*P. Coverick in Support of Debtors' Objection to Proof of Claim Filed by Tai Mo Shan Limited* [D.I. 20034].

5. On August 19, 2024, TMS filed the *Response of Tai Mo Shan Limited to Debtors' Objection to Proofs of Claim Filed By Tai Mo Shan Limited* [D.I. 23341] (the "Response").

6. The Debtors and TMS (together, the "Parties"), by and through their respective counsel, have discussed in good faith and agreed on a schedule governing the litigation of proofs of claim numbers 5475, 94967, and 95768 filed by TMS and the Debtors' Objection thereto, which is memorialized in the *Stipulation and Agreed Scheduling Order Governing Debtors' Objection to Proofs of Claim Filed By Tai Mo Shan Limited* (the "Stipulation"). Attached hereto as Exhibit A is a proposed order (the "Proposed Order") approving the Stipulation. Attached as Exhibit 1 to the Proposed Order is the Stipulation, as agreed to by and among the Parties.

7. The Parties have no objection to the entry of the Proposed Order. In accordance with the Court's electronic order processing procedures, a copy of the Proposed Order shall be uploaded to CM/ECF.

8. Accordingly, the Debtors respectfully request that the Court enter the Proposed Order at its earliest convenience.

Dated: October 3, 2024  
Wilmington, Delaware

**LANDIS RATH & COBB LLP**

/s/ Matthew B. McGuire

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